

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

FELECIA S. HENDRICKS)
Plaintiff,)
v.)
WARDEN McDONNELL AND)
THE ALABAMA DEPARTMENT)
OF CORRECTIONS.)
Defendants.)

CIVIL ACTION NO: CV-05-714-F

REPORT OF PLANNING MEETING

1. Pursuant to Fed. R. Civ. P. 26 (f), a meeting held on December 9 ,2005, telephonically and was attended by:
 - a. Armand W. Pitters, Attorney for the Plaintiff.
 - b. Gregory M. Biggs on behalf of Warden McDonnell and the Department of Corrections.
2. **Pre-Discovery Disclosures:** The parties will exchange within fourteen (14) days, the information required by Local Rule 26.1 (a)(1).
3. **Discovery Plan:** The parties jointly propose to the Court the following discovery plan:
 - a. Plaintiff states that discovery will be needed on the following subjects: Facts and circumstances surrounding the Plaintiff's termination; whether the Plaintiff was treated unequally and unfairly.
 - b. The Defendants state the discovery will be needed on the events leading up to and including Plaintiff's termination.
 - c. All discovery commenced in time to be completed by June 30, 2006.

- d. Maximum number of thirty (30) interrogatories by each party to any other party.
- Responses due within thirty (30) days of service.
- e. Maximum number of thirty (30) requests for admissions by each party to any other party. Responses due within thirty (30) days of service.
- f. Maximum number of ten (10) depositions by Plaintiff and ten (10) depositions for the Defendants. One deposition for each expert.
- g. Reports from retained experts under Rule 26 (a) (2) due:
 - from Plaintiffs by date to be decided;
 - from Defendants by a date to be decided.
- h. Supplementation under Rule 26 (e) shall be ongoing.
- i. Plaintiff should be allowed until January 30, 2006 to join additional parties and until January 30, 2006 to amend the pleadings.
- j. Defendants should be allowed until February 6, 2006 to join additional parties and until February 6, 2006 to amend the pleadings.
- k. All potential dispositive motions should be filed by July 1, 2006.
- l. The parties request a final pretrial conference in July 2006.
- m. Final lists of trial evidence under Rule 26 (a) (3) should be due:
 - From Plaintiff: witnesses by July 10, 2006; exhibits by July 10, 2006.
 - From Defendants: witnesses by July 17, 2006; exhibits by July 17, 2006.
- n. Parties should have seven (7) days after service of final lists of trial evidence to list objections under Rule 26 (a) (3).
- o. The case should be ready for trial by July 31, 2006 and at this time is expected to last approximately three (3) days for trial.

4. Settlement: The parties agree that serious settlement discussions are premature at this juncture.

/s/ Gregory Biggs

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